

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDGAR JOEL MARTINEZ-REYES,
RAUL CONTRERAS,
OSCAR EDUARDO MAYORGA,
LUIS BELANDRIA-CONTRERAS,
GUILLERMO ZAMBRANO,
DIEGO ACOSTA OVALLE,
BERNARDO MAUBERIS,
VIDAL LICON-ROBLES,
LEOPOLDO BERNAL,
DANIEL GONZALEZ,
aka "Rafael Arocho,"
VICTOR RODRIGUEZ-TRUJILLO,
JULIO ALEXANDER CABRERA,
JOSE ANTONIO PARDO, and
JIANDE ZHOU,

Defendants.

CR 2:23-cr-00524-SVW

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Aid and Abet the Distribution of Cocaine and Methamphetamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(A): Possession with Intent to Distribute Cocaine and Methamphetamine; 18 U.S.C. § 1956(h): Conspiracy to Launder Monetary Instruments; 18 U.S.C. § 371: Conspiracy to Operate an Unlicensed Money Transmitting Business; 31 U.S.C. §§ 5313, 5324(a)(3), (d)(2): Structuring Transactions to Avoid a Reporting Requirement; 18 U.S.C. §§ 111(a)(1), (b): Assaulting a Federal Officer With a Deadly Weapon; 18 U.S.C. §§ 982(a)(1) and 981(a)(1)(C), 28 U.S.C. § 2461(c), 21 U.S.C. § 853, and 31 U.S.C. § 5317: Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

A. TRADE IN GOODS FROM CHINA WAS USED TO CIRCUMVENT THE
RESTRICTIONS ON TAKING FUNDS OUT OF CHINA

1. The People's Republic of China ("PRC") maintained its economic strength in part by imposing a closed system of investment on its citizens. That is, individuals who live, work, or invest in the PRC were restricted from transferring more than the equivalent of \$50,000 per year out of China. Consequently, many individuals with holdings in China who wished to transfer assets greater than \$50,000 in value to the United States sought alternative methods outside the conventional banking system to move their funds. These informal value transfer systems ("IVTS") required the participation of brokers who buy and sell U.S. dollars in the United States.

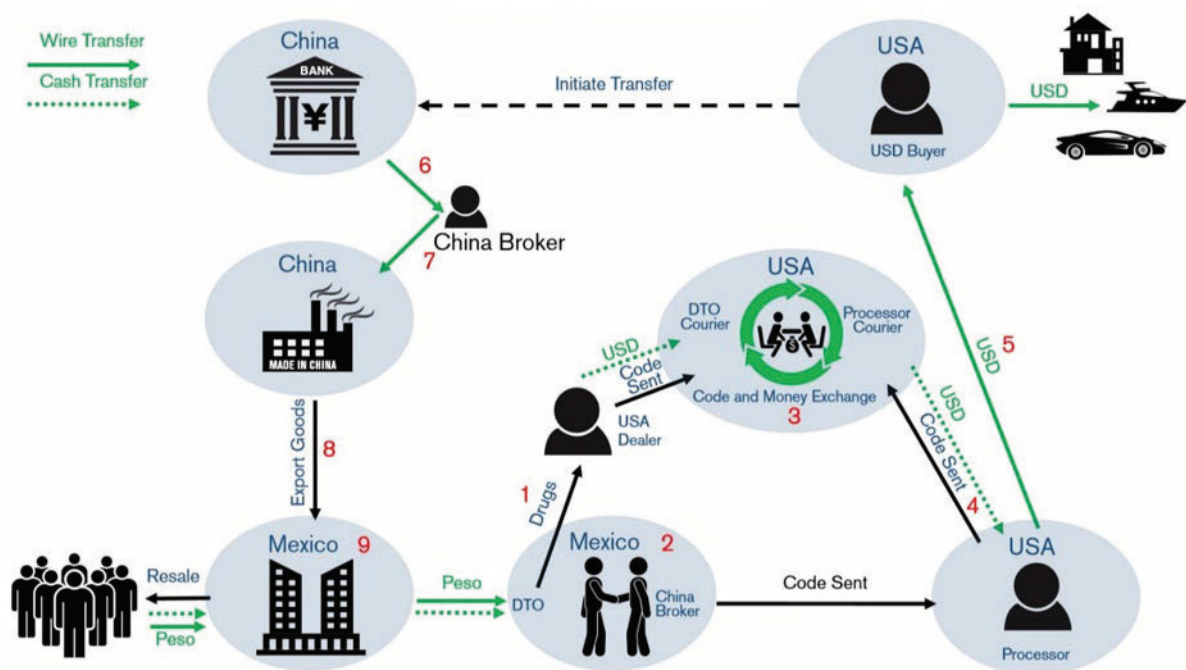
2. To transfer funds to the United States, an individual in China would contact a broker with dollars to sell in the United States. The individual in China would then transfer the equivalent amount in Chinese currency (renminbi) to an account in China specified by the broker. Once the broker received electronic confirmation that the amount in question had been moved to the specified account, the broker would arrange for the dollars in the United States to be released to the buyer or to a designated representative of the buyer.

3. The seller of U.S. currency in the United States would obtain dollars in a variety of ways, including by accepting cash from individuals engaged in criminal activity that generated large amounts of bulk currency, such as drug trafficking. The U.S. broker would charge a percentage commission as a fee to the owner of the criminal

proceeds to conceal the nature and source of the funds (also known as "laundering").

4. The funds that were transferred in China to the broker were then used to pay for goods purchased by businesses and organizations in Mexico, Colombia, or elsewhere such as consumer goods or items needed to aid the drug trafficking organization to manufacture illegal drugs, for example, precursor chemicals, including fentanyl. Once the goods were sold, generating local currency (for example, Mexican pesos), the proceeds would be returned to the drug trafficking organization that provided the dollars in the United States. In this way, the funds from China facilitated the laundering of drug trafficking proceeds from the United States to the source country, while at the same time providing United States dollars to the individual from China who initiated the transaction.

Money Broker Network



1 B. FEDERAL REPORTING REQUIREMENTS AND "STRUCTURING"

2 5. Under relevant federal law, a "financial institution," as
3 that term is defined in Title 31, United States Code,
4 Section 5312(a)(2)(R), included a business operating as an informal
5 money transfer system to facilitate the transfer of money
6 domestically or internationally outside of the conventional financial
7 institutions system.

8 6. Under federal law, whenever a financial institution,
9 including a bank, received over \$10,000 in currency in one
10 transaction or two or more related transactions that occurred within
11 one year, the financial institution was required to file a Currency
12 Transaction Report ("CTR") no later than 15 days after the
13 transaction over \$10,000.

14 7. If the person who was depositing or withdrawing the
15 currency did not want a CTR to be filed, they might try to evade that
16 filing by either purchasing cashier's checks with the currency under
17 the mistaken belief that such purchases need not be reported, or
18 "structuring" their deposits by (a) making repeated deposits into one
19 account under the \$10,000 reporting threshold, or (b) making multiple
20 deposits, each below \$10,000 in value, at different times, at
21 different bank locations, or into different accounts.

22 C. LICENSING REQUIREMENTS FOR ANY PERSON WHO ENGAGES IN
23 TRANSMITTING FUNDS AS A BUSINESS BY ANY MEANS, INCLUDING BY
24 COURIER

25 8. Under federal law, Title 31, United States Code, Section
26 5330 required the registration as a money transmitting business by
27 any person who engaged as a business in an informal money transfer
28 system or any network of people who engaged as a business in

1 facilitating the transfer of money domestically or internationally
2 outside of the conventional financial institutions system with the
3 United States Department of the Treasury, Financial Crimes
4 Enforcement Network.

5 9. Under federal law, Title 31, Code of Federal Regulations,
6 Section 1010.100(ff)(5)(i), a "money transmitter" was (1) a person
7 that provided money transmission services by accepting currency,
8 funds, or other items of value that substitute for currency from one
9 person and transmitting that currency, funds or other items of value
10 that substitute for currency to another location or person by any
11 means, including through a financial institution, an electronic funds
12 transfer network, or an informal value transfer system; or (2) any
13 other person engaged in the transfer of funds. A "money transmitter"
14 was required to be licensed by both federal and state law, and
15 failure to register under either federal or state law was a federal
16 offense under Title 18, United States Code, Section 1960.

17 10. Title 18, United States Code, Sections 1960(a) and (b)
18 prohibited the operation of an unlicensed money transmitting
19 business.

20 11. Title 18, United States Code, Section 1960(c) prohibited
21 the transportation or transmission of funds that were known to have
22 been derived from a criminal offense or were intended to be used to
23 promote or support unlawful activity.

24 12. None of the defendants, EDGAR JOEL MARTINEZ-REYES, RAUL
25 CONTRERAS, OSCAR EDUARDO MAYORGA, LUIS BELANDRIA-CONTRERAS, GUILLERMO
26 ZAMBRANO, DIEGO ACOSTA OVALLE, BERNARDO MAUBERIS, VIDAL LICON-ROBLES,
27 LEOPOLDO BERNAL, DANIEL GONZALEZ, also known as "Rafael Arocho,"
28 VICTOR RODRIGUEZ-TRUJILLO, JULIO ALEXANDER CABRERA, JOSE ANTONIO

1 PARDO, JIANDE ZHOU, nor any business owned by them, was licensed
2 under state or federal law regulations as a lawful money transmitter.

3 D. TRADE-BASED MONEY LAUNDERING

4 13. Trade-Based Money Laundering ("TBML") was a system of
5 informal value transfer that exploited legitimate businesses and
6 trade systems to launder the proceeds of illegal activity. TBML in
7 the drug trafficking context operated as follows:

8 a. Drug trafficking conducted within the United States
9 generated large quantities of U.S. currency ("drug trafficking
10 proceeds"), that had to be transferred in some manner to the true
11 owners of that currency, that is, the individuals in other countries
12 who were the sources of the illegal drugs.

13 b. Drug traffickers and others who committed illegal acts
14 in the United States were aware that banks and other financial
15 institutions were required to file CTRs that included the name and
16 identification of the beneficial owner or owners of those funds for
17 any transaction in U.S. currency in excess of \$10,000 and frequently
18 tried to evade these reporting requirements.

19 c. In addition, drug traffickers were alert to the high
20 costs of using the conventional banking system, which could include
21 exchange fees when exchanging dollars for pesos and/or wire transfer
22 fees.

23 d. In order to evade the high costs of transfer and the
24 government reporting that accompanied the deposit of large amounts of
25 currency into the legitimate banking system, drug traffickers sought
26 other methods of integrating the drug proceeds they accumulated in
27 U.S. currency into the legitimate financial system so that it could
28 be transferred to the true owners without detection.

1 e. Criminal actors such as drug traffickers typically
2 employed brokers or "money consolidators" who each operated as an
3 informal bank where drug traffickers could place their accumulated
4 drug proceeds, typically at lower exchange rates and for lesser fees
5 than those at legitimate financial institutions.

6 f. Brokers and money consolidators sought out businesses
7 and individuals in other countries who purchased merchandise in the
8 United States and needed U.S. dollars to pay for that merchandise.

9 g. The dollars were sold in the black market for pesos
10 and used to pay the open invoices of the businesses and individuals
11 who had purchased goods in the United States.

12 h. When the purchased goods were shipped to the country
13 of the purchaser and sold, the proceeds of those sales were then
14 relinquished to the owner of the drug proceeds in the country where
15 the drugs originated, that is, the drug trafficker whose product
16 generated the U.S. currency, thus enabling the drug trafficker to
17 avoid the physical transfer of currency across the border and the
18 accompanying risks of seizure and robbery.

19 14. These Introductory Allegations are incorporated into each
20 count of this Indictment.

COUNT ONE

[21 U.S.C. § 846]

[DEFENDANTS MARTINEZ-REYES, CONTRERAS, MAYORGA, BELANDRIA-CONTRERAS,
ZAMBRANO, OVALLE, MAUBERIS, LICON-ROBLES, GONZALEZ,
and RODRIGUEZ-TRUJILLO]

A. OBJECT OF THE CONSPIRACY

Beginning in or about October 2019, and continuing until on or about October 26, 2023, in Los Angeles, Ventura, and San Bernardino Counties, within the Central District of California, and elsewhere, defendants EDGAR JOEL MARTINEZ-REYES, RAUL CONTRERAS, OSCAR EDUARDO MAYORGA, LUIS BELANDRIA-CONTRERAS, GUILLERMO ZAMBRANO, DIEGO ACOSTA OVALLE, BERNARDO MAUBERIS, VIDAL LICON-ROBLES, DANIEL GONZALEZ, also known as "Rafael Arocho," and VICTOR RODRIGUEZ-TRUJILLO, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit an offense against the United States, namely, to aid and abet the distribution of controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2(a).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

1. Means By Which Defendants Assisted Sinaloa Cartel Drug Traffickers to Conceal Their Drug Proceeds

a. Members and operatives of the Sinaloa Cartel, a drug trafficking organization based in Mexico, would export large quantities of cocaine, methamphetamine, heroin, and marijuana into the United States and distribute those controlled substances through co-conspirators to cities across the country where they would be sold in large and small quantities. The sales of these controlled

1 substances would yield large amounts of drug trafficking proceeds in
2 U.S. currency. Concealment of the drug trafficking proceeds from
3 scrutiny by government or banking authorities was crucial to the drug
4 traffickers' ability to profit from their drug importation and
5 distribution scheme and maintain the viability of the scheme itself.

6 b. Defendants MARTINEZ-REYES, CONTRERAS, MAYORGA,
7 BELANDRIA-CONTRERAS, ZAMBRANO, OVALLE, MAUBERIS, LICON-ROBLES, and
8 GONZALEZ, and co-conspirators, would serve Sinaloa Cartel associates
9 by assisting them in concealing their drug trafficking proceeds and
10 making the proceeds generated in the United States accessible to the
11 Sinaloa Cartel owners in Mexico, Colombia, and elsewhere.

12 c. Defendants MARTINEZ-REYES, CONTRERAS, MAYORGA,
13 BELANDRIA-CONTRERAS, ZAMBRANO, OVALLE, MAUBERIS, LICON-ROBLES,
14 GONZALEZ, and RODRIGUEZ-TRUJILLO, co-conspirator Julio Alexander
15 Cabrera, and other co-conspirators, would collect the drug
16 trafficking proceeds belonging to the Sinaloa Cartel in the United
17 States in the form of U.S. currency, count and package them, and
18 deliver the U.S. currency to members of illegal money exchange and
19 remitting organizations known and unknown to the Grand Jury.

20 d. Sinaloa Cartel operatives would notify defendant
21 MARTINEZ-REYES of the approximate amount of drug trafficking proceeds
22 to be picked up and the location where the proceeds were to be picked
23 up and supply a telephone number and/or a code to defendant MARTINEZ-
24 REYES. In turn, defendant MARTINEZ-REYES would either pick up the
25 drug proceeds himself or would designate defendants CONTRERAS,
26 BELANDRIA-CONTRERAS, or ZAMBRANO to pick up the drug trafficking
27 proceeds at the time and place agreed upon and supply the designated
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1 person with the code and/or telephone number of the contact who was
2 to deliver the drug proceeds.

3 e. Defendants MARTINEZ-REYES, CONTRERAS, BELANDRIA-
4 CONTRERAS, ZAMBRANO, OVALLE, LICON-ROBLES, MAUBERIS, GONZALEZ, and
5 RODRIGUEZ-TRUJILLO, and co-conspirator Cabrera, would either deliver
6 the U.S. currency to locations or individuals specified by members of
7 the Sinaloa Cartel, or make other arrangements to launder the drug
8 trafficking proceeds by a variety of methods described herein.

9 f. Defendants BELANDRIA-CONTRERAS and ZAMBRANO, and co-
10 conspirators, would establish and maintain bank accounts in their own
11 names and the names of businesses or other individuals in the United
12 States for the purpose of integrating the drug trafficking proceeds
13 into the legitimate banking system in the United States.

14 g. Defendants MARTINEZ-REYES and CONTRERAS would either
15 deliver the drug trafficking proceeds in cash to individuals who,
16 needing U.S. currency, purchased those proceeds in exchange for
17 deposits into bank accounts designated by the Sinaloa Cartel members
18 who were the owners of the drug trafficking proceeds, or arrange for
19 the proceeds to be deposited into bank accounts established for that
20 purpose.

21 2. Means By Which Defendants Assisted Sinaloa Cartel Members
22 to Integrate the Drug Proceeds into the Legitimate Banking
23 System

24 a. In order to conceal the nature, source, location, and
25 ownership of the drug trafficking proceeds generated in the United
26 States, as well as to conceal the illegal drug trafficking scheme
27 itself, and to move the drug proceeds beyond the reach of law
28 enforcement, defendant MARTINEZ-REYES, and co-conspirators, would

1 arrange to purchase cryptocurrency that could easily be transferred
2 to accounts held by the Sinaloa Cartel.

3 b. Defendants MARTINEZ-REYES, CONTRERAS, MAYORGA,
4 BELANDRIA-CONTRERAS, and ZAMBRANO, and co-conspirators, would deliver
5 the drug trafficking proceeds to operators of an underground banking
6 system operated by Chinese nationals in the United States and
7 elsewhere for the purpose of supplying U.S. currency to Chinese money
8 exchanges that were operating illegally for use by their underground
9 banking customers in the United States.

10 c. Defendants BELANDRIA-CONTRERAS and ZAMBRANO, and co-
11 conspirators, would structure deposits of U.S. currency that
12 represented drug trafficking proceeds into bank accounts to avoid the
13 federal reporting requirement.

14 d. Defendant MARTINEZ-REYES would deliver drug
15 trafficking proceeds to co-conspirators for conversion of those
16 proceeds to cryptocurrency.

17 e. Defendant MAUBERIS would collect drug trafficking
18 proceeds from Sinaloa Cartel operatives in the United States, use
19 them to purchase precious metals and gems on the black market in the
20 United States, take those items to Mexico, and sell those items to
21 legitimate businesses in Mexico for a profit that he would use to
22 reimburse the true owners of the drug trafficking proceeds, that is,
23 the Sinaloa Cartel members, for the drug trafficking proceeds, in
24 U.S. currency he had been given to purchase material in the United
25 States, less a commission of .5 to 1.5 percent of the amount he had
26 received.

1 C. OVERT ACTS

2 On or about the following dates, in furtherance of the
3 conspiracy and to accomplish its object, defendants MARTINEZ-REYES,
4 CONTRERAS, BELANDRIA-CONTRERAS, MAYORGA, ZAMBRANO, OVALLE, MAUBERIS,
5 LICON-ROBLES, GONZALEZ, and RODRIGUEZ-TRUJILLO, and co-conspirators,
6 committed the following overt acts, among others, within the Central
7 District of California, and elsewhere:

8 1. On January 26, 2021, at the parking lot of an office
9 complex at 8060 Florence Avenue, Downey, California ("the office
10 complex"), defendant ZAMBRANO changed the front and back license
11 plates on his black 2014 Mercedes Benz to license plates that were
12 not assigned to that car.

13 2. On January 26, 2021, in Downey, California, after meeting
14 with defendants MARTINEZ-REYES and BELANDRIA-CONTRERAS, defendant
15 ZAMBRANO got into a 2010 silver Infiniti registered to defendant
16 MARTINEZ-REYES ("the silver Infiniti") and drove to 7914 Florence
17 Avenue, Downey, California, where defendant ZAMBRANO picked up a
18 weighted white bag containing an unknown quantity of U.S. currency
19 that represented drug trafficking proceeds from a co-conspirator and
20 then drove back to the office complex where he delivered the white
21 bag to defendant MARTINEZ-REYES.

22 3. On January 26, 2021, in Downey, California, defendant
23 BELANDRIA-CONTRERAS delivered a large leather backpack containing an
24 unknown quantity of U.S. currency that represented drug trafficking
25 proceeds to defendant MARTINEZ-REYES at the office complex.

26 4. On January 26, 2021, at 7920 Florence Avenue, Downey,
27 California, defendant ZAMBRANO, again driving the silver Infiniti,
28 picked up a second white bag containing an unknown quantity of U.S.

1 currency that represented drug trafficking proceeds from a co-
2 conspirator, and delivered the white bag to defendant MARTINEZ-REYES
3 at the office complex.

4 5. On January 26, 2021, at the office complex, defendant
5 MARTINEZ-REYES gave a large white bag with the words "Happy Birthday"
6 on the side containing \$226,600 in U.S. currency that represented
7 drug trafficking proceeds to a co-conspirator.

8 6. On January 27, 2021, at Citibank ATMs in Downey and Long
9 Beach, California, defendant BELANDRIA-CONTRERAS structured cash
10 deposits into his bank accounts to avoid a reporting requirement by
11 conducting 24 separate transactions to deposit a total of \$15,960 in
12 U.S. currency.

13 7. On January 29, 2021, at a Citibank ATM in Long Beach,
14 California, defendant ZAMBRANO structured cash deposits into his bank
15 account to avoid a reporting requirement by conducting 15 separate
16 transactions to deposit a total of \$19,900 in U.S. currency.

17 8. On March 23, 2021, in Fontana, California defendant
18 CONTRERAS picked up a yellow plastic bag containing an unknown
19 quantity of U.S. currency that represented drug trafficking proceeds
20 from co-conspirator Leopoldo Bernal.

21 9. On April 12, 2021, in Los Angeles, California, defendant
22 OVALLE delivered an unknown quantity of U.S. currency that
23 represented drug trafficking proceeds to defendant CONTRERAS.

24 10. On April 21, 2021, defendants MARTINEZ-REYES and CONTRERAS
25 delivered a Fruity Pebbles cereal box containing an unknown quantity
26 of U.S. currency that later proved to be approximately \$59,980 that
27 represented drug trafficking proceeds to a residence used as a
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1 collection point and count house to further money laundering activity
2 located at 11108 Freer Street, Temple City, California.

3 11. On May 19, 2021, defendant OVALLE picked up approximately
4 \$183,030 in U.S. currency that represented drug trafficking proceeds
5 from a co-conspirator.

6 12. On May 27, 2021, in Pasadena, California, defendant
7 GONZALEZ intentionally smashed his car into the official government
8 vehicle driven by United States Drug Enforcement Administration Task
9 Force Officer S.G., who was then trying to detain defendant GONZALEZ
10 as part of a drug trafficking investigation, in an attempt to
11 obstruct the investigation and injure that task force officer.

12 13. On May 27, 2021, in Pasadena, California, defendant
13 GONZALEZ possessed 46 individually-wrapped packages of U.S. currency
14 totaling approximately \$598,110 that represented drug trafficking
15 proceeds, pictured below.



1 14. On July 12, 2021, in Anaheim, California, defendant
2 CONTRERAS picked up an unknown quantity of U.S. currency in a large
3 black duffel bag that represented drug trafficking proceeds from a
4 co-conspirator.

5 15. On July 12, 2021, in Temple City, California, defendant
6 CONTRERAS delivered an unknown quantity of U.S. currency that
7 represented drug trafficking proceeds to a money stash house operated
8 by an unlicensed money exchange business located at 11108 Freer
9 Street.

10 16. On July 21, 2021, in El Monte, California, defendant
11 MAYORGA delivered an unknown quantity of U.S. currency that
12 represented drug trafficking proceeds to defendant CONTRERAS.

13 17. On July 29, 2021, in Los Angeles, California, defendant
14 LICON-ROBLES delivered an unknown amount of U.S. currency that
15 represented drug trafficking proceeds to defendant CONTRERAS.

16 18. On August 5, 2021, in Temple City, California, defendant
17 CONTRERAS delivered an unknown amount of U.S. currency that
18 represented drug trafficking proceeds to 11108 Freer Street.

19 19. On August 18, 2021, in Temple City, California, defendant
20 CONTRERAS delivered an unknown amount of U.S. currency that
21 represented drug trafficking proceeds to 11108 Freer Street.

22 20. On August 24, 2021, in Baldwin Park, California, defendant
23 MAYORGA delivered approximately \$249,500 in U.S. currency that
24 represented drug trafficking proceeds to defendant MAUBERIS.

25 21. On September 14, 2021, in Colton, California, defendant
26 MAYORGA delivered approximately \$99,350 in U.S. currency that
27 represented drug trafficking proceeds to a co-conspirator who was to
28 deliver the funds to Mexico.

1 22. On December 3, 2021, in Los Angeles, California, defendant
2 RODRIGUEZ-TRUJILLO picked up an unknown quantity of U.S. currency
3 that represented drug trafficking proceeds from a co-conspirator.

4 23. On December 16, 2021, in Lynwood, California, defendant
5 RODRIGUEZ-TRUJILLO possessed approximately \$379,660 in U.S. currency
6 that represented drug trafficking proceeds, pictured below.



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20 24. On January 5, 2022, in Pomona, California, defendant
21 MAYORGA possessed approximately \$205,330 in U.S. currency that
22 represented drug trafficking proceeds.

23 25. On February 17, 2022, in Commerce, California, defendant
24 MARTINEZ-REYES delivered approximately \$124,800 in U.S. currency that
25 represented drug trafficking proceeds to a co-conspirator.

26 26. On May 11, 2022, in Arcadia, California, defendant
27 MARTINEZ-REYES delivered an unknown amount of U.S. currency that
28 represented drug trafficking proceeds to a co-conspirator.

1 27. On October 18, 2022, in San Gabriel, California, co-
2 conspirator Cabrera delivered an unknown quantity of U.S. currency
3 that represented drug trafficking proceeds to a co-conspirator.
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COUNT TWO

[18 U.S.C. § 1956(h)]

[DEFENDANTS MARTINEZ-REYES, CONTRERAS, MAYORGA, BELANDRIA-CONTRERAS, ZAMBRANO, OVALLE, MAUBERIS, LICON-ROBLES, GONZALEZ, RODRIGUEZ-TRUJILLO, and CABRERA]

A. OBJECT OF THE CONSPIRACY

Beginning in or about October 2019, and continuing until on or about October 26, 2023, in Los Angeles, Ventura, and San Bernardino Counties, within the Central District of California, and elsewhere, defendants EDGAR JOEL MARTINEZ-REYES, RAUL CONTRERAS, OSCAR EDUARDO MAYORGA, LUIS BELANDRIA-CONTRERAS, GUILLERMO ZAMBRANO, DIEGO ACOSTA OVALLE, BERNARDO MAUBERIS, VIDAL LICON-ROBLES, DANIEL GONZALEZ, also known as "Rafael Arocho," VICTOR RODRIGUEZ-TRUJILLO, and JULIO ALEXANDER CABRERA, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit an offense against the United States, namely:

To knowingly and intentionally conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, knowing that the property involved in the financial transactions represented the proceeds of a specified unlawful activity, and which property was, in fact, the proceeds of a specified unlawful activity, that is, the unlawful distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

1 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
2 ACCOMPLISHED

3 The object of the conspiracy was to be accomplished, in
4 substance, by the Means alleged in Count One, Section B of this
5 Indictment, which are re-alleged and incorporated by reference
6 herein.

7 C. OVERT ACTS

8 On or about the following dates, in furtherance of the
9 conspiracy and to accomplish its object, defendants MARTINEZ-REYES,
10 CONTRERAS, MAYORGA, BELANDRIA-CONTRERAS, ZAMBRANO, OVALLE, MAUBERIS,
11 LICON-ROBLES, GONZALEZ, "RODRIGUEZ-TRUJILLO, and CABRERA committed
12 the following overt acts, among others, within the Central District
13 of California, and elsewhere:

14 The Overt Acts 1 through 27 alleged in Count One, Section C of
15 this Indictment are re-alleged and incorporated by reference herein.
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COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)(II)]

[DEFENDANT BERNAL]

On or about March 25, 2021, in San Bernardino County, within the Central District of California, defendant LEOPOLDO BERNAL knowingly and intentionally possessed with intent to distribute at least 500 grams, that is, approximately 4,000 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT LICON-ROBLES]

On or about July 29, 2021, in Los Angeles County, within the Central District of California, defendant VIDAL EMILIO LICON-ROBLES knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 30.1 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT ZHOU]

On or about July 26, 2022, in Los Angeles County, within the Central District of California, defendant JIANDE ZHOU knowingly and intentionally possessed with intent to distribute at least 50 grams, that is, approximately 7.189 kilograms, of methamphetamine, a Schedule II controlled substance.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. § 2(a)]

[DEFENDANTS CABRERA and PARDO]

On or about October 18, 2022, in Los Angeles County, within the Central District of California, defendants JULIO ALEXANDER CABRERA and JOSE ANTONIO PARDO, each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 50.6 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.



COUNT SEVEN

[18 U.S.C. §§ 371, 1960]

[DEFENDANTS MARTINEZ-REYES, CONTRERAS, MAYORGA, BELANDRIA-CONTRERAS,
ZAMBRANO, OVALLE, and MAUBERIS]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, but no later than January 2021, and continuing to in or about October 2023, in Los Angeles, Ventura, and San Bernardino Counties, within the Central District of California, and elsewhere, defendants EDGAR JOEL MARTINEZ-REYES, RAUL CONTRERAS, OSCAR EDUARDO MAYORGA, LUIS BELANDRIA-CONTRERAS, GUILLERMO ZAMBRANO, DIEGO ACOSTA OVALLE, and BERNARDO MAUBERIS, and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally conduct, control, manage, supervise, direct, and own an unlicensed money transmitting business affecting interstate and foreign commerce, which failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder, all in violation of Title 18, United States Code, Sections 1960(a) and 1960(b) (1) (A), (B), and (C).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

The object of the conspiracy was to be accomplished, in substance, by the Means alleged in Count One, Section B of this Indictment which are re-alleged and incorporated by reference herein.

1 C. OVERT ACTS

2 On or about the following dates, in furtherance of the
3 conspiracy and to accomplish its object, defendants MARTINEZ-REYES,
4 CONTRERAS, MAYORGA, BELANDRIA-CONTRERAS, ZAMBRANO, OVALLE, and
5 MAUBERIS committed the following overt acts, among others, within the
6 Central District of California, and elsewhere:

7 The Overt Acts 1 through 27 alleged in Count One, Section C of
8 this Indictment are re-alleged and incorporated by reference herein.

COUNT EIGHT

[31 U.S.C. §§ 5324(a)(3), (d)(2); 18 U.S.C. § 2(b)]

[DEFENDANT BELANDRIA-CONTRERAS]

On or about January 27, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUIS BELANDRIA-CONTRERAS knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured, assisted in structuring, and willfully caused to be structured, the following ATM deposits to a Citibank account ending in -1658 with a domestic financial institution, namely, Citibank, and did so while violating another law of the United States, namely, Title 18, United States Code, Section 1956, and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

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Location of Citibank ATM	Time	Amount of Cash Deposited
Downey, CA	3:47 p.m.	\$880
Downey, CA	3:48 p.m.	\$680
Downey, CA	3:49 p.m.	\$420
Downey, CA	3:50 p.m.	\$820
Downey, CA	3:51 p.m.	\$520
Downey, CA	3:51 p.m.	\$640
Downey, CA	3:52 p.m.	\$740
Downey, CA	3:53 p.m.	\$400
Downey, CA	3:53 p.m.	\$860
Downey, CA	3:54 p.m.	\$840
Downey, CA	3:55 p.m.	\$840
Downey, CA	3:56 p.m.	\$320
Long Beach, CA	4:59 p.m.	\$280
Long Beach, CA	4:59 p.m.	\$780
Long Beach, CA	5:00 p.m.	\$940
Long Beach, CA	5:01 p.m.	\$900
Long Beach, CA	5:02 p.m.	\$520
Long Beach, CA	5:02 p.m.	\$580
Long Beach, CA	5:03 p.m.	\$720
Long Beach, CA	5:04 p.m.	\$520
Long Beach, CA	5:04 p.m.	\$760
Long Beach, CA	5:05 p.m.	\$820
Long Beach, CA	5:06 p.m.	\$580
Long Beach, CA	5:06 p.m.	\$600

Total transactions: 24

Total amount deposited: \$15,960

COUNT NINE

[31 U.S.C. §§ 5324(a)(3), (d)(2); 18 U.S.C. § 2(b)]

[DEFENDANT ZAMBRANO]

On or about January 29, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant GUILLERMO ZAMBRANO knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured, assisted in structuring, and willfully caused to be structured, the following ATM deposits to a Citibank account ending in -0057 with a domestic financial institution, namely, Citibank, and did so while violating another law of the United States, namely, Title 18, United States Code, Section 1956, and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

Location of Citibank ATM	Time	Amount of Cash Deposited
Long Beach, CA	11:39 a.m.	\$3,500
Long Beach, CA	11:40 a.m.	\$2,300
Long Beach, CA	11:41 a.m.	\$4,100
Long Beach, CA	11:42 a.m.	\$780
Long Beach, CA	11:42 a.m.	\$820
Long Beach, CA	11:43 a.m.	\$860
Long Beach, CA	11:44 a.m.	\$820
Long Beach, CA	11:45 a.m.	\$880
Long Beach, CA	11:46 a.m.	\$940
Long Beach, CA	11:47 a.m.	\$880
Long Beach, CA	11:48 a.m.	\$940
Long Beach, CA	11:50 a.m.	\$800
Long Beach, CA	11:51 a.m.	\$700
Long Beach, CA	11:51 a.m.	\$720
Long Beach, CA	11:52 a.m.	\$860

Total transactions: 15**Total amount deposited: \$19,900**

COUNT TEN

[18 U.S.C. § 111(a)(1), (b)]

[DEFENDANT GONZALEZ]

On or about May 27, 2021, in Los Angeles County, within the Central District of California, defendant DANIEL GONZALEZ, also known as "Rafael Arocho," intentionally and forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with United States Drug Enforcement Administration Task Force Officer S.G., while S.G. was engaged in, and on the account of, the performance of his official federal duties, and in so doing, used a deadly and dangerous weapon, namely, a 2013 Lexus ES350 car.



FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One and Three through Six of this Indictment.

2. Any defendant so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which said defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), any defendant so convicted shall forfeit substitute property if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the

jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(1), in the event of any defendant's conviction of the offenses set forth in either of Counts Two or Seven of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) Any property, real or personal, involved in such offense, and any property traceable to such property; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 18, United States Code, Section 982(b)(2), any defendant so convicted shall forfeit substitute property, if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. Substitution of assets shall not be ordered, however, where the convicted defendant acted merely as an intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant, in
2 committing the offense or offenses giving rise to the forfeiture,
3 conducted three or more separate transactions involving a total of
4 \$100,000.00 or more in any twelve-month period.

FORFEITURE ALLEGATION THREE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offense set forth in Count Seven of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) all right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION FOUR

[31 U.S.C. § 5317]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 31, United States Code, Section 5317, in the event of any defendant's conviction of the offenses set forth in either of Counts Eight or Nine of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All property, real or personal, involved in the offense and any property traceable thereto; and

(b) To the extent that such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Section 5317(c)(1)(B), any defendant so convicted shall forfeit substitute property, if, by any act or omission of said defendant, the property described in the preceding, or any portion thereof; (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in

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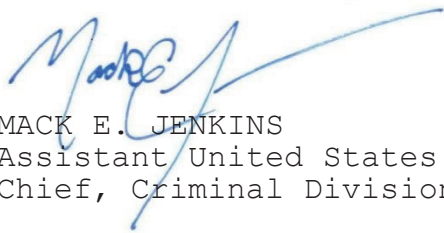
value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/s/

Foreperson

E. MARTIN ESTRADA
United States Attorney



MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

J. MARK CHILDS
Assistant United States Attorney
Chief, International Narcotics,
Money Laundering, and
Racketeering Section

BENEDETTO L. BALDING
Assistant United States Attorney
Deputy Chief, International
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JULIE J. SHEMITZ
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Section